

## applied to Subgrant or "Umbrella"

# What are “umbrella” projects?

## ◆ Basic characteristics:

- ◆ Large number of small-scale activities being funded under a larger project
- ◆ Activities are not fully defined at the time of proposal submission (e.g., community-defined activities)
- ◆ Lack of definition poses difficulties for the traditional IEE process!

# Examples

- ◆ Typical “umbrella” situations:
  - ◆ Subgrants--PVOs or NGOs receive money from USAID and give sub-grants to other organizations
  - ◆ USAID gives grants to a number of partner organizations to carry out small-scale activities under a single, larger project
    - ➔ E.g., West Bank & Gaza Community Services Program



# Applying the IEE to “umbrella projects”

- ◆ When activities are not defined:
  - ◆ The Mission or partner submits an “umbrella IEE”
  - ◆ Umbrella IEE sets out a **NEGATIVE DETERMINATION WITH CONDITIONS**
  - ◆ The condition is that activities (subgrants or otherwise) are subject to environmental review and documentation as they are defined
  - ◆ Generally call this “subgrant environmental review”



# Subgrant environmental review: a summary

- ◆ The partner completes environmental screening forms for the sub-grant projects as they are defined
- ◆ Screening forms are compatible to the regular Reg. 216 Screening process
- ◆ Screening forms indicate if an “environmental review” (ER) and/or Mission scrutiny of activity is necessary
- ◆ An ER is similar to an IEE



# Who has responsibility?

- ◆ Responsible party is *legally responsible* for assuring that sub-grants are environmentally sound
  - ◆ Responsible party=
    - ➔ lead Partner for subgrant programs
    - ➔ Grantee in direct grant programs



# Subgrant screening approaches

- ◆ No single model exists
- ◆ Training materials provide 3 models:
  - ◆ AFR model
  - ◆ Revised/proposed AFR model
  - ◆ West Bank & Gaza model developed for community services program



# WBG model

- ◈ Defines a screening process based on Reg 216 categories
- ◈ Screening results in 1 of 3 classifications:
  - ♦ Very low risk
  - ♦ Very high risk
  - ♦ Self-certification

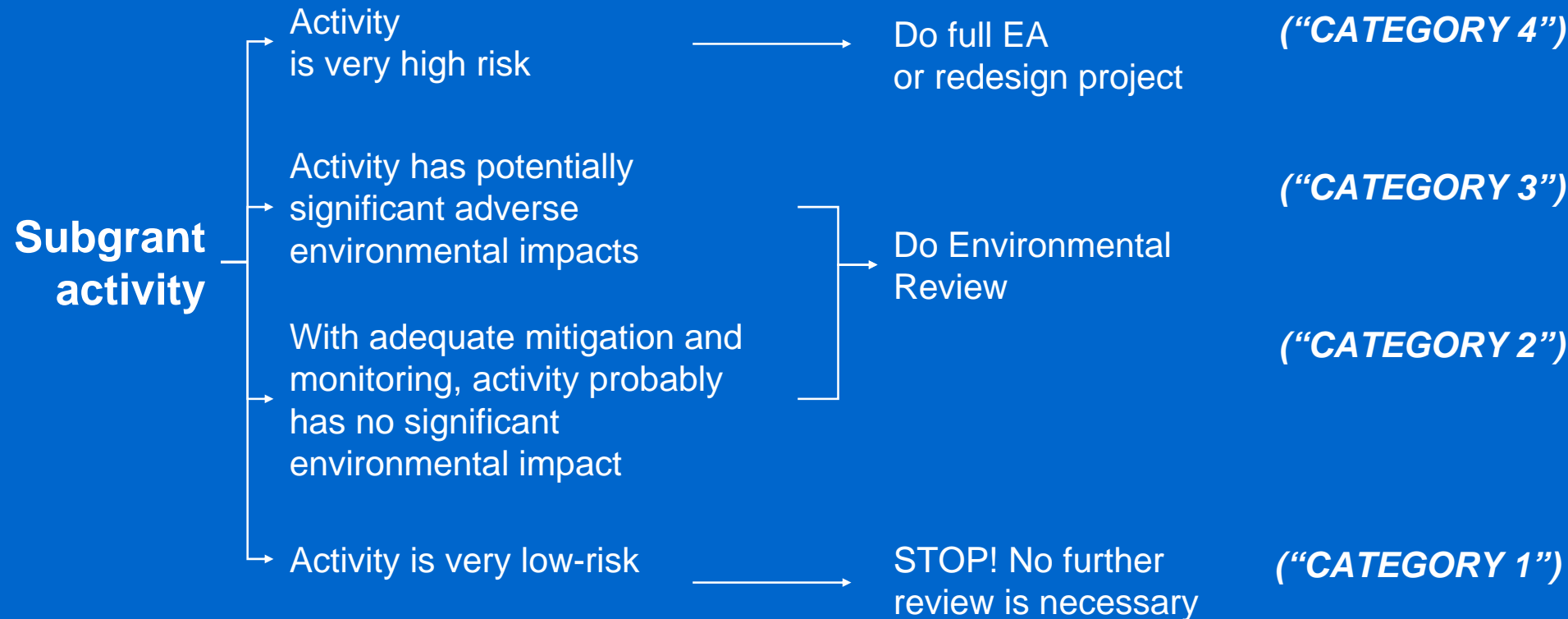


# WBG model

- ◆ Very high risk triggers mission oversight and potentially an EA
- ◆ Self-certification involves a commitment to best practices and mitigation
  - ◆ Grantees are encouraged to write an environmental review (like an IEE) to determine appropriate mitigation



# Subgrant screening: AFR model



# AFR model

- ◆ Category definitions are very similar to Reg 216 categories
  - Category 1 (very low-risk)
    - ➔ = categorical exclusion
  - Category 3 & 4 (moderate and high-risk)
    - ➔ = activities usually demanding a full EA under Reg 216
  - Category 2
    - ➔ Subgrants that would normally qualify for a negative determination under Reg. 16, based on the fact that the grantee used an environmentally-sound approach to the activity design and incorporated appropriate mitigation and monitoring procedures.

# AFR model

## ◇ Analysis required when result of subgrant screening is:

- ♦ Category 1 → Screening form
- ♦ Category 2 → Screening form + Environmental review
- ♦ Category 3 → Screening form + Environmental review
- ♦ Category 4 → Screening form + Full EA



# What does an Environmental Review look like?

**1.0 PROGRAM/PROJECT DESCRIPTION**

**2.0 COUNTRY AND ENVIRONMENTAL INFORMATION (BASELINE INFORMATION)**

**3.0 EVALUATION OF PROJECT/PROGRAM ISSUES WITH RESPECT TO ENVIRONMENTAL IMPACT POTENTIAL**

**4.0 RECOMMENDED MITIGATION (INCLUDING MONITORING AND EVALUATION)**

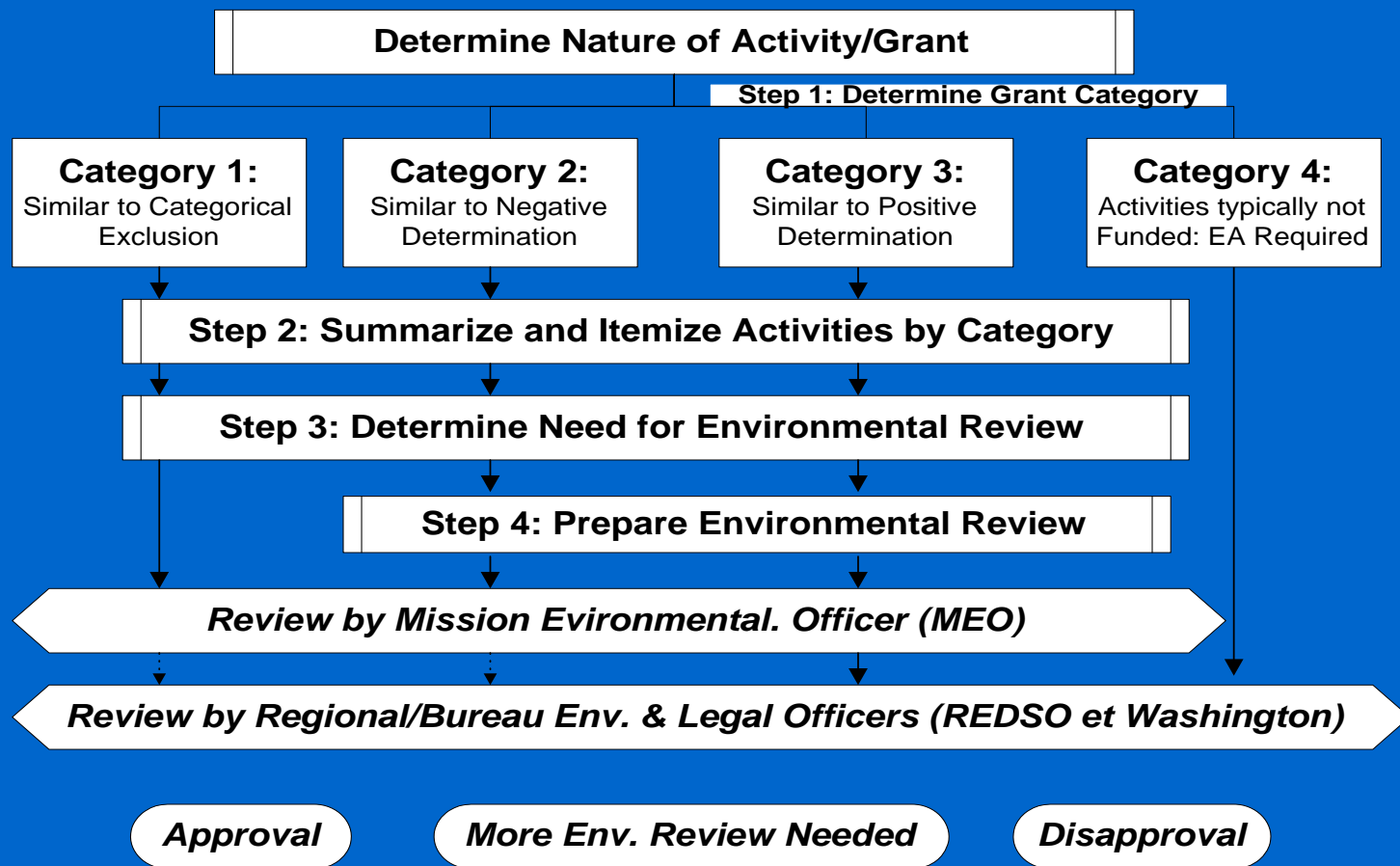


# AFR model

- ◆ Screening forms and environmental reviews go to MEO
  - ◆ Categories 1 and 2 can be approved by the USAID Mission.
  - ◆ Categories 3 and 4 must have Regional and Bureau review to determine if an EA is needed.
- ◆ USAID may accept or reject the finding of the screening form/environmental review, or require more analysis



# Summary: AFR Subgrant screening and env. review process



## Revised/proposed AFR model

- ◈ Intermediate between AFR and WBG models
- ◈ Eliminates complicated category classification scheme of AFR
- ◈ But requires (not suggests) IEE-like Environmental Reviews for all but the lowest-risk activities